

UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

JUSTIN MOON,)

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Plaintiff,)

) Civil Action No. _____

v.)

) COMPLAINT FOR DAMAGES

AMBER JOVANELLY, individually and as)

Owner/Agent of Southern Dreams Realty, LLC;)

SOUTHERN DREAMS REALTY, LLC,)

Defendants.)

)

Plaintiff, Justin Moon, by and through himself, alleges the following:

1. This is a civil action for damages arising from Defendants unlawful retaliation against Plaintiff in violation of the Fair Housing Act (42 U.S.C. 3617) and other federal protections afforded to tenants.
2. Plaintiff resides at 457 Amicks Ferry Road, Chapin, South Carolina, under a valid lease agreement governed by the South Carolina Residential Landlord and Tenant Act.
3. Plaintiff operates a licensed business and homeschools his children from this residence.
4. In March and April 2025. Plaintiff lawfully asserted his rights under the lease and applicable laws

by requesting that all notices of entry and communication regarding showings be sent by certified mail.

5. In direct retaliation for this request, Defendants began scheduling an excessive and unreasonable number of

home showings, disrupting Plaintiffs work, family, and schooling scheduleaveraging 3 times per week, 4-6 hours per showing.

6. On or about April 15, 2025, Defendant Amber Jovanelly admitted in writing that these showings were a direct response to Plaintiff's request to be notified only through certified mail.

7. Defendants actions were intended to punish, harass, and displace Plaintiff in retaliation for asserting legal tenant rights and requesting lawful forms of notice.

8. Plaintiff is part of a protected class, as a recovering addict, a felon, and a homeschooling parent, and is thus protected from discriminatory and retaliatory practices under federal law.

9. As a result of Defendants conduct, Plaintiff has suffered emotional distress, lost income, disruption to his business operations, and a substantial burden to his family life.

10. Plaintiff seeks judgment against Defendants in the amount of \$275,000, including compensatory damages, punitive damages, and any other relief this Court deems just and proper.

Respectfully submitted,

Justin Moon

Plaintiff, Pro Se

May 14, 2025

